

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigations Plans Discovery 2026-2028
Data Response

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Requester DR No.:	CONF-SPD-PGE-WMP2026-004
Requesting Party:	Safety Policy Division
Requester:	Edwin Schmitt
Date Sent:	May 6, 2025

SUBJECT: MITIGATION COST EFFICIENCY ASSESSMENT (SPD-PGE-WMP2026-004)

QUESTION 036

Throughout the 2026-2028 Base WMP, PG&E uses the terms system hardening, grid hardening, and resiliency mitigation activities to describe the same category of mitigations, namely undergrounding, covered conductor and distribution line removal. Explain why PG&E uses three different terms for this category of mitigations.

a. Are there differences between these terms? If so, explain.

ANSWER 036

Note: all references in this response are specific to distribution-related terms in PG&E's 2026-2028 Base WMP, R0, April 4, 2025.

Resilience Mitigations

Resilience Mitigations describe one of the four categories of mitigations that support PG&E's foundational framework of risk-information decision-making designed to minimize ignition risk and outage impacts.¹ PG&E's system resilience activities are critical to permanently reducing wildfire risk, minimizing negative aspects of PSPS and EPSS, and strengthening the grid against extreme weather events (p. 6).

System Resilience describes mitigations designed to reduce ignition risk by changing how PG&E's grid is constructed and operated (2023-2025 Base WMP, R8, p. 255). Resilience Mitigation describe a broader category of mitigations than just system hardening. While Resiliency Mitigations include system hardening activities (distribution undergrounding, distribution covered conductor, distribution line removal), it also includes non-system hardening mitigations, such as distribution pole replacement and reinforcement and HFTD/HFRA open tag reduction - distribution (2026-2028 Base WMP, R0, Figure PG&E-6.1.3.3-1).

System Hardening

¹ The four categories are: Comprehensive Monitoring and Data Collection; Operational Mitigations; System Resilience; Community Support.

System hardening describes two distribution system hardening initiatives:

1. Covered conductor (CC) installation and line removal, including remote grids (GH-12); and
2. Distribution undergrounding (GH-04).

Grid Hardening

WMP Section 8.8.2 is called “Grid Hardening.” PG&E uses the term “grid hardening” in our Section 8.8.2 narrative to align to the title of WMP Section 8.8.2 as specified by Energy Safety in its 2026-2028 WMP Guidelines². In PG&E’s Section 8.8.2 narrative, we state that grid hardening projects include undergrounding (p. 345). The term is also specified by Energy Safety in Area for Continuous Improvement (ACI) PG&E-25U-03, Continuation of Grid Hardening Joint Studies, so PG&E uses the term in its response to that ACI.

- a. While grid hardening and system hardening are basically synonymous, the key distinction among the three terms PG&E uses in **the WMP is that Resilience Mitigations** refers to a broader category of mitigations than just grid hardening or system hardening.

² <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58025&shareable=true>